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May 21, 2018

Hon. James Orenstein
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
VIA ECF

Re: Godlewska et al. v. Human Development Association, Inc. et al.
Docket No: 03-cv-3985 (JO)

Dear Judge Orenstein:

Please accept this short letter as a joint status report by the parties before the final pre-trial conference today.

We bring good news to you. 115 plaintiffs have consented in writing to the settlement agreement and their settlement payments represent 85% of the allocated settlement sums. 74 plaintiffs have not sent their written consents, of which only eight (8) plaintiffs responded and advised that they disputed either the settlement amounts they stood to receive, or Plaintiff's counsel's determination that based on the information and evidence they provided, they had no damages under the applicable law. Of these eight plaintiffs, Teresa Taraska requested through her daughter that Plaintiff's counsel provide her with documents relevant to the case, so that she can decide what course of action to take. The remaining 66 plaintiffs have not responded at all to several efforts to communicate by Plaintiff's counsel.

Considering that the eight disputed claims would most likely be subsumed by the amounts not claimed by the rest, counsel for the parties will respectfully request of Your Honor to consider turning the first day of the trial into a fairness hearing and permit Defendants to negotiate with those who dispute their claims with a view to resolving the matter amicably.

Thank you for your attention to the foregoing.

Respectfully submitted,

/s/Robert Wisniewski
Robert Wisniewski

cc: Richard Howard, Esq.
Counsel for Defendants